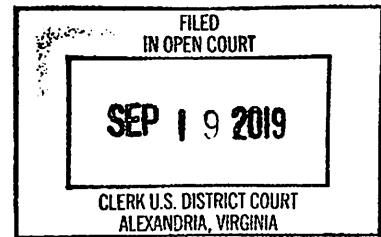


IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

Alexandria Division



UNITED STATES OF AMERICA

v.

OKSANA VOVK

Defendant.

)
) No. 1:19-cr-283
)
) Count 1: Conspiracy to Distribute Cocaine
) (21 U.S.C. §§ 846, 841(a)(1))
)
) Count 2: Conspiracy to Commit Money
) Laundering
) (18 U.S.C. §1956)
)
) Forfeiture Notice: 21 U.S.C. § 853;
) 18 U.S.C. § 982

INDICTMENT

September 2019 Term - at Alexandria

COUNT ONE

(Conspiracy to Distribute 500 grams or more of Cocaine)

THE GRAND JURY CHARGES THAT:

From in and about June 2014, and continuing to on or about November 4, 2016, within the Eastern District of Virginia, and elsewhere, the defendant, OKSANA VOVK, did unlawfully, knowingly and intentionally combine, conspire, confederate and agree with other persons, both known and unknown, to unlawfully, knowingly, and intentionally distribute five hundred (500) grams or more of cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

(In violation of Title 21, United States Code, Section 846).

COUNT TWO

(Conspiracy to Commit Money Laundering)

From in or around June 2014, and continuing to on or about November 4, 2016, within the Eastern District of Virginia, the defendant, OKSANA VOVK, did unlawfully, willfully, and knowingly combine, conspire, confederate, and agree together and with others known and unknown to the Grand Jury, to commit the following offenses against the United States:

The defendant, OKSANA VOVK, knowing that the property involved in a financial transaction represented the proceeds of some form of unlawful activity, namely, the conspiracy to distribute controlled substances as set forth and charged in Count One of this Indictment, did knowingly conduct and attempt to conduct such a financial transaction (1) with the intent to promote the carrying on of specified unlawful activity, and (2) knowing that the transaction was designed in whole and in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of said specified unlawful activity, in violation of Title 18, United States Code, Sections 1956(a)(1)(A)(i) and (a)(1)(B)(i).

(All in violation of Title 18, United States Code, Sections 1956(h))

FORFEITURE NOTICE

THE GRAND JURY FURTHER FINDS there is probable cause that the property described below is subject to forfeiture. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, the defendant, OKSANA VOVK, is hereby notified that if convicted of Count One, charged in this Indictment, she shall forfeit to the United States, pursuant to 21 U.S.C. § 853, any property that is traceable to, derived from, fungible with, or a substitute for property that constitutes the proceeds of the offense and any property used or intended to be used to commit or facilitate the commission of the offense. If convicted of Count Two, she shall forfeit, pursuant to 18 U.S.C. § 982, any property involved in the offense and any property traceable to such property.

(All Pursuant to Title 21, United States Code, Section 853 and Title 18, United States Code, Section 982)

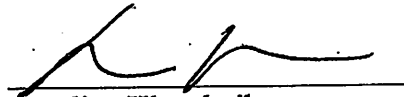
A TRUE BILL

Pursuant to the E-Government Act,
The original of this page has been filed
under seal in the Clerk's Office

Foreperson of the Grand Jury

G. Zachary Terwilliger
United States Attorney

By:


Karolina Klyuchnikova
Special Assistant United States Attorney (LT)